

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 lrobbins@wrightlegal.net

*Attorneys for Plaintiff, The Bank of New York Mellon Trust Company, National Association FKA
The Bank of New York Trust Company, N.A. as Successor to JP Morgan Chase Bank N.A., as
Trustee for RAMP 2005-RS8*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 THE BANK OF NEW YORK MELLON
13 TRUST COMPANY, NATIONAL
14 ASSOCIATION FKA THE BANK OF NEW
15 YORK TRUST COMPANY, N.A. AS
16 SUCCESSOR TO JP MORGAN CHASE
17 BANK N.A., AS TRUSTEE FOR RAMP
2005-RS8,

18 Plaintiff,

19 vs.

20 FIDELITY NATIONAL TITLE GROUP,
21 INC.; CHICAGO TITLE INSURANCE
22 COMPANY; TICOR TITLE OF NEVADA,
23 INC.,

24 Defendants.

Case No.: 2:20-cv-01373-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
14, 15 & 16]**

[Second Request]

25 Plaintiff The Bank of New York Mellon Trust Company, National Association FKA The
26 Bank of New York Trust Company, N.A. as Successor to JP Morgan Chase Bank N.A., as
27 Trustee for RAMP 2005-RS8 (“BONY”), and Defendants Chicago Title Insurance Company,
28 Fidelity National Title Group, Inc., and Ticor Title of Nevada, Inc. (“Defendants”) (collectively,
the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

///

///

- 1 1. On July 24, 2020, BONY filed its Complaint [ECF No.1]
- 2 2. On October 7, 2020, Defendants each filed a Motion to Dismiss [ECF Nos. 14, 15 &
- 3 16];
- 4 3. BONY's deadline to respond to Defendants' Motion to Dismiss is currently
- 5 November 20, 2020;
- 6 4. BONY's counsel is requesting a fourteen (14) day extension until Friday, December
- 7 4, 2020, to file its response to Defendants' Motions to Dismiss;
- 8 5. This extension is requested in order to allow the parties additional time to discuss a
- 9 potential stipulation to stay litigation pending a decision in the *Wells Fargo Bank,*
- 10 *N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-17332 (District Court
- 11 Case No. 3:19-cv-00241-MMD-WGC);
- 12 6. Counsel for Defendants do not oppose the requested extension;

13
14 ///

15
16 ///

17
18 ///

19
20 ///

21
22 ///

23
24 ///

25
26 ///

27
28 ///

7. This is the second request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 20th day of November, 2020.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins

Darren T. Brenner, Esq.

Nevada Bar No. 8386

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

Attorneys for Plaintiff, The Bank of New York Mellon Trust Company, National Association FKA The Bank of New York Trust Company, N.A. as Successor to JP Morgan Chase Bank N.A., as Trustee for RAMP 2005-RS8

DATED this 20th day of November, 2020.

SINCLAIR BRAUN LLP

/s/ Kevin Sinclair

Kevin Sinclair, Esq.

Nevada Bar No. 12277


16501 Venture Boulevard, Suite 400

Encino, California 91436

Attorneys for Defendants, Fidelity National Title Group, Inc., Ticor Title of Nevada, Inc., and Chicago Title Insurance Company

IT IS SO ORDERED.

Dated this 23rd day of November, 2020.



UNITED STATES DISTRICT COURT JUDGE